

EXHIBIT 1

From: Alan Frank
To: Michael Masri; Steven Frankel
Cc: Evan Frank
Subject: RE: Grant Johnson v. Esports -- Notice of Deposition
Date: Tuesday, May 16, 2023 6:01:33 PM
Attachments: [image001.png](#)

All good. Thanks Michael. Regards.

Alan L. Frank, Esquire
Alan L. Frank Law Associates, P. C.
135 Old York Road
Jenkintown, PA 19046
215.287.7601 – Mobile
215.935.1000 – Office
215.935.1110 – Fax
afrank@alflaw.net
Come visit us at Alflaw.net

--
ATTENTION:

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the individual(s) named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering this to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify us by telephone at (215)935-1000 or notify us by e-mail at dmcguckin@alflaw.net.

From: Michael Masri <mmasri@meltzerlippe.com>
Sent: Tuesday, May 16, 2023 5:56 PM
To: Alan Frank <afrank@alflaw.net>; Steven Frankel <SFrankel@meltzerlippe.com>
Cc: Evan Frank <EFrank@alflaw.net>
Subject: RE: Grant Johnson v. Esports -- Notice of Deposition

I apologize for the delay in responding. Typically, I respond to emails within 24 hours. If not, there is normally something unusual occurring.

SEE BELOW IN CAPS.

From: Alan Frank <afrank@alflaw.net>
Sent: Friday, May 12, 2023 8:21 AM
To: Steven Frankel <SFrankel@meltzerlippe.com>
Cc: Michael Masri <mmasri@meltzerlippe.com>; Evan Frank <EFrank@alflaw.net>
Subject: RE: Grant Johnson v. Esports -- Notice of Deposition

Good morning. I recommend that we do all of the deps in your midtown NY office – or alternatively via zoom. LET'S DISCUSS BUT THAT SHOULD WORK.

Minneola doubles the distance for me. Likewise, it makes the trip from Toronto that much longer.
IF YOU PREFER OUR NY OFFICE THAT IS FINE WITH US.

Also, Jenkintown, PA is within 100 miles of the Courthouse. So that is a viable deposition venue if we cannot otherwise reach an agreement.

Please let me know if we can agree to use your midtown NY offices. SHOULD NOT BE A PROBLEM.

Please also let me know if we will be cooperatively scheduling depositions or rather instead just issuing Notices as you have done with this one. OF COURSE. WE SERVED THE NOTICE TO PRESERVE THE RIGHT. AND, WE ARE TRYING TO MOVE FORWARD AS QUICKLY AS POSSIBLE.

Finally, please copy Evan Frank on all future email traffic. OK.

We do very much look forward to cooperatively working with you as to all of the mechanics for this case. AS DO WE.

Thanks. Best regards,

Alan L. Frank, Esquire
Alan L. Frank Law Associates, P. C.
135 Old York Road
Jenkintown, PA 19046
215.287.7601 – Mobile
215.935.1000 – Office
215.935.1110 – Fax
afrank@alflaw.net
Come visit us at Alflaw.net

ATTENTION:

IRS CIRCULAR 230 DISCLOSURE:

Pursuant to Treasury Regulations, any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used or relied upon by you or any other person, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any tax advice addressed herein.

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the individual(s) named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering this to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify us by telephone at (215)935-1000 or notify us by e-mail at afrank@alflaw.net

From: Steven Frankel <SFrankel@meltzerlippe.com>

Sent: Thursday, May 11, 2023 5:03 PM

To: Alan Frank <afrank@alflaw.net>

Cc: Michael Masri <mmasri@meltzerlippe.com>
Subject: Grant Johnson v. Esports -- Notice of Deposition

Dear Mr. Frank,

Please see the attached Notice of Deposition of plaintiff Grant Johnson.

Thank you,

Steven E. Frankel
Meltzer, Lippe, Goldstein & Breitstone, LLP
190 Willis Ave
Mineola, NY 11501
Phone 516-747-0300 Ext. 231
Fax 516-747-0653
www.meltzerlippe.com

New York City Office:
70 East 55th Street – 19th Floor
New York, NY 10022
Phone 212-201-1720



Any U.S. tax advice contained in this communication (including any attachments) unless otherwise expressly indicated is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. This electronic message transmission contains information which is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination or distribution of this communication to other than the intended recipient is strictly prohibited. If you have received this communication in error, please notify us immediately by calling (516) 747-0300 or by electronic mail (info@meltzerlippe.com). Thank you.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

Any U.S. tax advice contained in this communication (including any attachments) unless otherwise expressly indicated is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending

to another party any transaction or matter addressed herein. This electronic message transmission contains information which is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination or distribution of this communication to other than the intended recipient is strictly prohibited. If you have received this communication in error, please notify us immediately by calling (516) 747-0300 or by electronic mail (info@meltzerlippe.com). Thank you.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>
